

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

| | | |
|--------------------------|---|-----------------------------------|
| CRYSTAL DENISE PHILLIPS, |) | CIVIL ACTION NO. 2:23-cv-3856-BHH |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | COMPLAINT |
| |) | (AUTOMOBILE ACCIDENT) |
| BRANDO ELIJAH LAW, |) | (JURY TRIAL DEMANDED) |
| |) | |
| Defendant. |) | |

Plaintiff alleges as follows:

1. Plaintiff, Crystal Denise Phillips, is a citizen and resident of the State of Ohio. Defendant is a citizen and resident of Berkeley County, South Carolina.
2. On March 4, 2022, Plaintiff was proceeding in an easterly direction on Folly Road, Charleston County, South Carolina, and was stopped at the intersection with Camp Road.
3. Defendant, approaching this intersection from the opposite direction on Folly Road, crossed the center line and struck Plaintiff's vehicle head-on.
4. Defendant was negligent and reckless in one or more of the following ways:
 - a) Failing to keep a proper lookout;
 - b) Failing to keep his vehicle under proper control;

- c) Failing to timely apply his brakes;
- d) Failing to execute proper maneuvers to avoid a collision;
- e) Failing to exercise the degree of caution that a reasonably careful person would exercise under the same or similar circumstances.

4. As a direct result of Defendant's negligence and recklessness, Plaintiff sustained the following damages:

- a) Medical bills, including physician, hospital, and prescription charges;
- b) Physical and mental pain and suffering;
- c) Loss of enjoyment of life.

WHEREFORE, Plaintiff demands judgment against Defendant for such amount of actual and punitive damages as the trier of facts shall determine, for the costs of this action, and for such further relief as the Court deems proper.

S/JOHNNY F. DRIGGERS
JOHNNY F. DRIGGERS, ESQUIRE
108 Central Avenue, Suite 7
Goose Creek, SC 29445
(843) 572-8222
(843) 797-2114 (facsimile)
Federal Bar No. 606
ATTORNEY FOR PLAINTIFF

Goose Creek, South Carolina

August 4, 2023.